IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	
H.C. JEFFRIES TOWER	§ CASE NO. 17-35027	-Н5-11
COMPANY, INC.	§ (Chapter 11)	
Debtor	§	
	§	
FORD STEEL, LLC.	§ CASE NO. 17-35028	
Debtor	§ (Chapter 11)	
	§ JUDGE RODRIGUE	E Z
	§	
	§ JOINTLY ADMINISTERE	D UNDER
	§ CASE NO. 17-35027-H5-11	

Expedited Second Motion for Entry of Final Decree for Ford Steel, LLC Pursuant to Federal Bankruptcy Rule 3022 A Hearing is Requested Prior to September 30, 2020 [Refers to Docket No. 242]

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

TO THE HONORABLE EDUARDO V. RODRIGUEZ, UNITED STATES BANKRUPTCY JUDGE:

Ford Steel, LLC, Debtor-in-Possession herein, files this Expedited Second Motion for Entry of Final Decree Pursuant to Federal Bankruptcy Rule 3022 (the "Motion"), and in support

thereof would show this Court as follows:

- The Order Confirming Plan was entered on May 29, 2019. The Amended Order Confirming Plan was entered on June 27, 2019.
- 2. Counsel's Final Fee Application was approved on June 10, 2019 at Docket No. 271.
- 3. The Debtor's Post-Confirmation Certificate was filed on June 10, 2019.
- 4. The Debtor refiled under Chapter 11 of Title 11 of the United States Code on September 1, 2020, in Case No. 20-34405 (the "Second Filing"). The Second Filing is currently pending before this Court.
- 5. The Appeal filed by the United States was dismissed by agreement on September 2, 2020.
- 6. The Debtor has been filing quarterly, post-confirmation operating reports and has funds on hand to pay the quarterly fees for the third quarter of 2020.
- 7. The Debtor is requesting that this Court enter the Final Decree on an expedited basis as it continues to incur U.S. Trustee Fees in both this and the Second Filing and October 1, 2020, will begin the fourth quarter for purposes of fees.

Respectfully submitted this 16th day of September, 2020.

COOPER & SCULLY, PC.

By: /s/ Julie M. Koenig

Julie M. Koenig
SBA# 14217300
815 Walker, Suite 1040
Houston, Texas 77002
713/236-6800 (Telephone)
713/236-6880 (Telecopier)
Julie.Koenig@cooperscully.com

Attorneys for the Trustee

Certificate of Service

I hereby certify that a true and correct copy of the foregoing has been served on all of the parties on the attached service list, including parties requesting notice, via either ECF Notification or by certificateofservice.com, on the 16th day of September, 2020.

By: /s/ Julie M. Koenig
Julie M. Koenig

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American Express Bank, FSB D & L Quality Painting, Inc. Case 17-35027 Label Matrix for local noticing 0541-4 c/o Becket and Lee LLP

Case 17-35028 PO Box 3001

Southern District of Texas Malvern, PA 19355-0701 Houston

Ford Steel, LLC Texas Comptroller of Public Accounts 24800 Ford Road c/o Office of the Attorney General Porter, TX 77365-5450

PO Box 12548

United States Bankruptcy Court Dept. 978763 P.O. Box 8763

AZZ Inc American Express One Museum Place P.O. Box 650448 3100 West 7th Street

American Petroleum Institute P.O. Box 1425 Merrifield, VA 22116-1425

Fort Worth, TX 76107-8701

Wed Sep 16 13:01:10 CDT 2020

PO Box 61010

Suite 500

Houston, TX 77208-1010

Bozeman Engineering, Inc. 5868 Westheimer, #309 Houston, TX 77057-5641

Carboline Company 2150 Schuetz Road St. Louis, MO 63146-3504

Conroe Welding Supply, Inc. P.O. Box 2588 Conroe, TX 77305-2588

Currin, Wuest, Mielke, Paul & Knapp, PLL 800 Rockmead, Suite 220 Kingwood, TX 77339-2197

Entergy P.O. Box 8104 Baton Rouge, LA 70891-8104 Bankruptcy - Collections Division MC-008

Austin, tx 78711-2548

AISC Industry Fund Carol Stream, IL 60197-8763

Dallas, TX 75265-0448

Attorney General Department of Justice 10th and Constitution Ave N.W. Rm. 400 Washington, D.C. 20530-0001

C. W. Rod Tool Company, L.P. P.O. Box 4346, Dept. 271 Houston, TX 77210-4346

Chamberlain Hrdlicka 1200 Smith Street Suite 1400 Houston, TX 77002-4496

Cooper & Scully, P.C. 815 Walker St., Suite 1040 Houston, TX 77002-5776

D & L Quality Painting, Inc. c/o G Riley Hetherington 11 Greenway Plaza Suite 2820 Houston, Texas 77046-1114

Equitable Life & Casualty Insurance Company c/o Bruce J. Ruzinsky/Jackson Walker L.L 1401 McKinney, Suite 1900 Houston, TX 77010-4037

c/o G Riley Hetherington 11 Greenway Plaza Suite 2820 Houston, TX 77046-1114

Triple-S Steel Supply, L.L.C. 8000 Jensen Dr. Houston, TX 77093-8215

ATTORNEY GENERAL TAX DIV. - BANKRUPTCY POB 12548 AUSTIN, TX 78711-2548

American Logistics Group 68 S SERVICE RD 100 MELVILLE, NY 11747-2350

Aztec Galvanizing Services P.O. Box 843771 Dallas, TX 75284-3771

Capital One Bank (USA), N.A. PO Box 71083 Charlotte, NC 28272-1083

Cleveland Punch and Die Company P.O. Box 92594-T Cleveland, OH 44190-0001

Crown Industrial LLC. P.O. Box 471 Willow Grove, PA 19090-0471

D&L QUALITY PAINTING INC 12212 GREEN RIVER DR HOUSTON, TX 77044-2213

Equitable Life and Casualty Insurance Co 3 Triad Center Salt Lake City, UT 84180-1211

Case 17-35027 Document 319 Filed in TXSB on 09/16/20 Page 5 of 7 Fort Worth Tower LLC

Esskay Structures, Inc.
2950 Short Court
Vienna, VA 22181-5906

P.O. Box 848366 Dallas, TX 75284-8366 P.O. Box 419267 Kansas City, MO 64141-6267

Griffin Trade Group LLC 12777 Jones Rd. Ste. 315 Houston, TX 77070-4692 Gulf Coast Steel Inc. 9420 Knight Rd. Houston, TX 77045-1206 HARRIS COUNTY/CITY OF HOUSTON C/O BANKRUPTCY DEPT PO BOX 3064 HOUSTON, TX 77253-3064

HJ Tower Management Inc. 24900 Ford Road Porter, TX 77365-5452 Harris County c/o John Dillman PO Box3064 Houston, TX 77253-3064

Hebert Jeffries 23605 White Oak Forest Porter, TX 77365-5127

IRS 8701 S. GESSNER HOUSTON, TX 77074-2915 (p)INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346 IWS Gas & Supply of Texas, LTD. 125 Thruway Park Broussard, LA 70518-3601

IWS Gas and Supply of Texas, LTD Lisa Gintz 4709 Bluebonnet Blvd. Suite A Baton Rouge, LA 70809-9655 Internal Revenue Service 12941 North Freeway, Ste. 316 Stop HNW Houston, TX 77060-1241 Internal Revenue Service Insolvency Department PO Box 7346 Philadelphia, PA 19101-7346

Intertek Asset Integrity Management, Inc P.O. Box 419435 Boston, MA 02241-9435 Konecranes Inc. P.O. Box 641807 Pittsburgh, PA 15264-1807 LINEBARGER, GOGGAN & BLAIR PO BOX 3064 HOUSTON, TX 77253-3064

Landsberg P.O. Box 731575 Dallas, TX 75373-1575 Lantek Systems, Inc. 5155 Financial Way, Suite #6 Mason, OH 45040-0055 Lisa Gintz 4709 Bluebonnet Blvd. Suite A Baton Rouge, LA 70809-9655

MONTGOMERY COUNTY
TAX COLLECTOR
400 N SAN JACINTO
CONROE, TX 77301-2823

Marco 701 East Boulevard Deer Park, TX 77536-1915 McNichols Company P.O. Box 101211 Atlanta, GA 30392-1211

Meadow Lark Agency Inc. PO Box 150029 Ogden, UT 84415-0029 Memorial Herman Health Plan P.O.BOX 223767 DALLAS, TX 75222-3767 Metelmex Int, INC. 3006 April Ln. Houston, TX 77092-7216

Montgomery County c/o Tara L. Grundemeier Linebarger Goggan Blair & Sampson LLP P.O. Box 3064 Houston, Tx 77253-3064 North American Galvanizing Company, LLC Attn: Marcile Staub 1800 West 21st Street South Tulsa, OK 74107-2712

Northern Safety Company, Inc. P.O. Box 4250 Utica, NY 13504-4250 Prystash Insurance Agency

Case 17-35027 Document 319 Filed in TXSB on 09/16/20 Page 6 of 7 Puma Chemical Puma Ch

PO Box 123427

2207 Danbury P.O. Box 17926 San Antonio, TX 78217-0926

P.O. Box 67 Marble, NC 28905-0067

Dallas, TX 75312-3427

RODGERS, MILLER & MCLAIN, P.C. 4444 Carter Creek Pkwy, Suite 208 P.O. BOX 4884

BRYAN, TEXAS 77805-4884

Rick Peterson RL Land Services LLC 4111 Fitzwater Drive Spring, TX 77373-7444 S&B Modular Operations, Ltd. 3959 Oscar Nelson Jr. Dr. Baytown, TX 77523-8022

S&B Modular Operations, Ltd. c/o Brent Searcy B3W-322 7825 Park Place Blvd. Houston, TX 77087-4639

SECURITIES AND EXCHANGE COMMISSION 450 FIFTH STREET NW WASHINGTON, DC 20549-0006

Sagebrush Towers Inc. 24900 Ford Road Porter, TX 77365-5452

Sepco Septic Service 80 Westbrook Circle Waller, TX 77484-9703 Service Steel Warehouse, L.P. P.O. Box 843965 Dallas, TX 75284-3965

Standard Premium 13590 SW 134th Ave, Suite 214 Miami, FL 33186-4576

Standard Premium-Auto 13590 SW 134th Ave, Suite 214 Miami, FL 33186-4576

Steel and Pipe Supply Co. P.O.BOX 731266 Dallas, TX 75373-1266

Steve Bales 909 Crystal Creek Dr. Austin, TX 78746-4709

SuddenLink P.O. Box 660365 Dallas, TX 75266-0365

TEXAS COMPTROLLER OF PUBLIC ACCOUNTS 111 E. 17TH STREET AUSTIN, TX 78774-0100 Attn: Bankruptcy Dept

TEXAS WORKFORCE COMMISSION REGULATORY INTEGRITY DIVISION - SAU 101 EAST 15TH STREET, ROOM 556 AUSTIN, TX 78778-0001

Texas Workforce Commission PO Box 149037 Austin, Texas 78714-9037

The Bank & Trust of Bryan/College Statio 1716 Briarcrest, Suite 400 Bryan, TX 77802-2766

The Bank & Trust of Bryan/College Statio PO Box 5847 Bryan, TX 77805-5847

Triple-S Steel Supply Co. P.O. Box 21119 Houston, TX 77226-1119

Tupa Ventures, Inc 26212 Whispering Pines St. Magnolia, TX 77355

TxTag P.O. Box 650749 Dallas, TX 75265-0749

U-Stone Tooling Co. Inc P.O. Box 9402 Houston, TX 77261-9402

UNITED STATES TRUSTEE 515 Rusk Avenue, Ste. 3516 Houston, Texas 77002-2604

US Trustee Office of the US Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002-2604

United Tool and Fastener, Inc. P.O. Box 38951 Houston, TX 77238-8951

Xerox Capital Services, LLC P.O. Box 7405 Pasadena, CA 91109-7405

Julie Mitchell Koenig Cooper & Scully, PC 815 Walker, Suite 1040 Houston, TX 77002-5776

Case 17-35027 Document 319 Filed in TXSB on 09/16/20 Page 7 of 7

Steve M. Williard The Williard Law Firm, LP 1920 North Memorial Way Suite 207 Houston, TX 77007-5385

> The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

IRS PO BOX 149047 AUSTIN, TX 78714

(d) Internal Revenue Service 1919 Smith St. Stop 5024 HOU Houston, TX 77002

(d) Internal Revenue Service STOP 6692 AUSC Austin, TX 73301-0030

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) United States of America

(d) American Express Bank, FSB c/o Becket and Lee LLP PO Box 3001 Malvern PA 19355-0701

(d) Texas Comptroller of Public Accounts c/o Office of the Attorney General Bankruptcy - Collections Division MC-008 PO Box 12548 Austin TX 78711-2548

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